

## **Privacy Notice**

Last updated February 2023

### **Who Are We?**

CETA Insurance Limited is an independent intermediary dealing with selected insurers and authorised and regulated by the Financial Conduct Authority (FRN 307824).

CETA Insurance Limited, registered office CETA House, Cromwell Business Park, Chipping Norton, Oxfordshire, OX7 5SR, registered number 02827690 (VAT registration number 1620 53 146, ICO registration number Z5174633) is the Data Controller under the General Data Protection Regulation in connection to the processing of your personal data.

The CETA Group of companies include ATEC Group Holdings Ltd (registered number 10849742), ATEC Group (Midco) Ltd (registered number 10849904), ATEC Group (Holdco) Ltd (registered number 10849976) and Atec Group Ltd (registered number 10850019).

CETA Insurance Limited is committed to protecting the privacy of our customers. We endeavour to comply with the Data Protection Act 2018 and UK General Data Protection Regulation (GDPR) and relevant data protection legislation. This Privacy Notice aims to inform you about how we use your personal data, keep your information secure and your choices.

### **How to contact us**

CETA Insurance Limited

CETA House Cromwell Business Park

Chipping Norton

Oxfordshire

OX7 5SR

Email – [insurance@ceta.co.uk](mailto:insurance@ceta.co.uk)

Telephone 01608 647601

If you have any queries about this Privacy Notice or related data protection questions, please contact our Data Protection Officer using the contact details above.

### **Our Services**

This Privacy Notice explains how we will use information about you and the steps we take to ensure your information is kept confidential, secure and up to date.

## What information we will collect about you

We collect information about you when you give this to us during the course of using our services, for example when you obtain a quotation from us for insurance online or via telephone. We also collect information when you voluntarily complete an application for an insurance quotation via our websites. We may also store information about your visit to our websites, including demographic data and browsing patterns. We may monitor and or record telephone calls.

When we refer to personal data, we mean information that relates to an identified or identifiable individual.

The personal data which we may collect about you will include: your name, address, contacts details, age, date of birth, financial information (for example account or card details), and travel plans (destination, planned activities, dates of travel). In order to provide a quotation or in order to assess the terms of the insurance contract CETA Insurance may need to collect data that the GDPR defines as “special categories of personal data (such a medical conditions or criminal convictions). This information is only requested if it is required for acceptability criteria as defined by our insurers underwriting conditions.

## How we use the information collected about you

We will use your personal data and information provided by you in order to perform a contract to arrange and manage your insurance policy, including handling underwriting and claims and issuing your insurance policy renewal documents to you. These activities may involve us releasing personal data and / or information provided by you, to other insurers, regulatory authorities, or agents providing services on our behalf. This is necessary in order for us to provide an insurance policy to you. However, there are a number of other reasons why we use your personal data.

Under GDPR, we need to make you aware of the reasons to use your personal data and when we will be doing this. Where we rely on legitimate interest, we have balanced this with the interests and rights of our customers.

Why we require your personal data	Legal Ground for processing
To review your application for insurance and to provide you with a quotation.	Legal Ground: Performance of contract. This is necessary in order to provide you with the quotation which you have requested.
To provide and administer as well as service your insurance policy, assess eligibility for and handling and paying claims.	Legal Ground: Performance of contract. This is necessary in order to provide you with the insurance policy. We also have a legitimate interest in order to validate data in order to allow claims to be processed.
To communicate with you and resolve any complaints you may have.	Legal Ground: Performance of contract. This is necessary in order to provide you with information regarding your insurance policy. We also have a legitimate interest need to allow complaints to be resolved.
To pay for your policy either in full or via instalments.	Legal Ground: Performance of contract. This is necessary to provide you with the insurance policy.

To prevent, detect and investigate fraud.	Legal Ground: Performance of contract. This is necessary in order to provide you with the insurance policy. We also have a legitimate interest in order to validate data in order to prevent fraud.
For the purpose of debt recovery (Where we have not received payment for your insurance policy)	Legal Ground: Legitimate interest. To recover any unpaid debt.
For our own management information. Including; accounting records, Internal audit requirements, Insurer audit requirements, Professional advice such as legal advice.	Legal Ground: Legitimate interest. To use data to monitor performance and monitor records as well as to carry out research and analysis about our products.
To comply with our legal and / or regulatory obligations.	Legal Ground: Legal obligation. We have a business need to comply with our legal and / or regulatory obligations.
Providing training and quality assessment.	Legal Ground; Legitimate interest. We have a business need to improve and monitor the service which we provide.
Providing you with renewal information.	Legal Ground; Legitimate interest. It is in the customer's interest to receive renewal communications to ensure that the customer is able to have continued insurance in place. It would not be in a customer's interest to exclude customers from these communications in the event that the customer had opted out of receiving marketing communications.
To provide direct marketing information to you.	Legal Ground; Legitimate interest. To provide information and offers regarding similar products to you. We use the information which we know about you to ensure that our marketing communications are relevant to the product which you selected.

### Passing on information about you

We may share the information which we hold and which has been supplied to us in connection with any application for insurance that you have made or any insurance policy which you have with us (including the renewal of any insurance policy which you have with us) with the Claims and Underwriting Exchange register, run by Insurance Database Services Limited (IDS Ltd). The legitimate interest for this is to help the insurer check information that is given to us and to prevent fraudulent claims. When we process your request for insurance cover, the insurer may search these registers. Under the conditions of your insurance policy, you must tell us about any incident (such as an accident or theft), whether or not you think it is likely to give rise to a claim. When you tell us about an incident, we will pass information relating to that incident to these registers. Some insurers or product providers may carry out checks against public records and or use the services of third party credit referencing agencies.

We may share the information which we hold and which has been supplied to us in connection with any application for motor insurance that you have made or any insurance policy which you have with us (including

the renewal of any insurance policy which you have with us) with the Motor Insurance Database (MID) which is the central record of all insured vehicles in the UK. It is managed by the MIB and is used by the Police and the Driver and Vehicle Licensing Agency (DVLA) to enforce motor insurance laws. The legitimate interest for this is to help the Police and the Driver and Vehicle Licensing Agency (DVLA) check that insurance details are up to date and a relevant policy is in place. Enforcement agencies and the police also use the MID to tackle uninsured driving. They have the power to remove uninsured vehicles from UK roads.

We may also share the information which we hold and which has been supplied to us in connection with any application for insurance that you have made with Woven (A trading style of HSM Limited) and Outworx Contact Centre (PTY) Ltd in order to outbound calls to discuss the application with you.

In addition to the above, if you purchase insurance through ourselves we may pass on your personal data to the following parties;

1. Other members of the CETA Insurance group of companies in order to process your insurance policy.
2. Our insurer partners – Including but not limited to an insurer whose products and/or services are included within our quote engines. This is required in order for them to provide you with a quotation for the product selected by you. When the insurer uses your data in this manner they will be acting as the data controller of your information, therefore it is important to read your selected insurer's privacy policy to understand how they will use your data.

Your information may be provided to the following insurers; Abbey Legal Protection, Accelerant Insurance Europe SA, Accredited Insurance (Europe) Limited, Ageas, AIG Europe Limited, All Clear Insurance, Allianz Insurance PLC, Alpha Underwriting, Amtrust Europe Limited, Angel Risk Management Limited, Ansvar Insurance, Arc Legal Assistance Limited, Arkel Limited, Aviva, AXA Insurance UK PLC, AXA XL Axiom Underwriting, Beazley, Building Block Insurance, Call Assist, Canopus Managing Agents, Cardiff Pinnacle, Cedar Underwriting Ltd, Channel, Coast (Park Home Insurance Services Ltd), Commercial Express Quotes Limited, Corin, Covea Insurance PLC, DTW 1991, Ergo UK Speciality Limited, Event Insurance, Exeter Family Friendly, Fairmead Insurance Limited, Financial and Legal Insurance Company Limited, Frank Pickles Insurance Brokers Limited, Geo Personal Lines, Geo Underwriting Services Limited, Great Lakes Insurance SE, Gresham Underwriting Limited, HCC, Healix, I Partners, Integra Insurance Solutions Ltd, Jigsaw Insurance Limited, KGM Underwriting Services Limited, Legal Insurance Management, Leisureinsure LLP, Lexelle Limited, Markerstudy Insurance Services Limited, Midas Underwriting, Mobilers Insurance Services Limited, Mosaic Insurance Service Limited, MS Amlin, Munich RE, Navigators and General, NIG, Ocaso, Pardus Underwriting Ltd, Pen Underwriting, Plum Underwriting Limited, Prestige Underwriting Services Limited, Rentguard, RSA Insurance Group PLC, Tokio Marine HCC, Topsail Insurance Limited, Towergate Insurance, Trent Services, UK General, Vantage, Vasek, Woodley Hall, Worldwide Special Risks, XL Catlin, Zenith, Zurich Insurance PLC.

3. Financial Conduct Authority – for the purpose of compliance monitoring.
4. Other Service Providers which we use who provide certain services in order to fulfil our obligations. These include Premium Credit Ltd who provide finance for our policies; Elavon Financial Services DAC / Sage Pay Europe Ltd who process card payments on our behalf; Imail who we use to post correspondence to our customers, Feefo who obtain customer reviews on our behalf. Mention Me in order to validate our refer-a-friend program. BYC Aqua, who provide quality assessment for any outsourced calls. Outworx Contact Centre (PTY) Ltd who provide an outsourced call centre resource to ourselves. Data enrichment services for pricing and underwriting.

#### **Keeping you informed of offers and services / Will I be contacted for marketing purposes?**

We may advise you via e-mail, post, telephone or by text of products, services and other offers that we think may be of interest to you. Any electronic communication will include clear instructions should you wish to unsubscribe at any time. We will always inform you if we wish to send you marketing communications in the future and always provide you with an opportunity to say no.

If you no longer wish to be contacted for marketing purposes, please e-mail [insurance@ceta.co.uk](mailto:insurance@ceta.co.uk) or you can unsubscribe by using the unsubscribe link on our emails. Alternatively, you can request to be removed by writing to us at the following address; Data Protection Officer, CETA Insurance Ltd, CETA House, Cromwell Business Park, Chipping Norton, Oxon, OX7 5SR.

### **When will CETA Insurance contact me?**

After you get an online quote we may contact you by telephone and email unless you have asked not to be contacted. We do this to confirm that the details you have given us are correct and to ensure we have provided you with the most appropriate level of cover and premium.

Shortly before renewal, we may try to speak to you by phone about your renewal requirements. If we do not contact you, we will send you a renewal invitation by email and/ or post and request that you contact us.

We may also contact you during the period of insurance in the event that your insurer has requested additional information or if the insurer has requested us to send you information relating to your insurance policy.

## **Cookies**

### **What is a cookie?**

A cookie is a text file containing a small amount of data, which often includes a unique identifier that is sent to your computer, tablet or mobile phone web browser from a website's computer and is stored on your device's hard drive. Cookies help websites to understand browsing habits on their sites, understand the number of visitors to the sites and the pages which have been visited; and remember you once you revisit a site to remember your preferences.

### **How does CETA use cookies?**

We use "cookies" to identify you when you visit our site and to build up a profile of our regular users. A cookie is a small piece of information sent by a web server to a web browser, which enables the server to collect information back from the browser.

Our use of cookies also allows you to be presented with a personalised version of the site. We will only read cookies from your cookie file placed there through your web browser's interaction with our site.

We may also use cookies to allow third party vendors, including Google, to show this website's ads on other sites on the internet and to allow third party vendors, including Google, to use cookies to serve ads based on your prior visits to this website. You may opt out of Google's use of cookies by visiting the Google advertising opt-out page. (Alternatively, you can opt out of a third-party vendor's use of cookies by visiting the Network Advertising Initiative opt out page.)

## **Your rights**

You can exercise any of the following rights using our contact details;

CETA Insurance Limited

CETA House Cromwell Business Park

Chipping Norton

Oxfordshire

OX7 5SR

Email – [insurance@ceta.co.uk](mailto:insurance@ceta.co.uk)

Telephone 01608 647601

Under GDPR, you have the right to stop receiving direct marketing at any time.

Where we have no legitimate reason to continue to hold your information, you have the right to erasure.

You may request that we delete any data which we hold about you at any time if you have provided this data during the course of obtaining a quotation through ourselves.

If you have a current insurance policy with ourselves, we will need to retain some of your data as part of providing the insurance to you and as part of our regulatory requirements. Please see the below section “How long will CETA Insurance keep my information?” for further information.

You have the right to request to have any inaccurate personal data rectified or completed if the data we hold is incomplete.

You have the right to ask for significant decisions that have been made about you wholly by automated means to be reviewed.

You have the right to request that we transfer any personal data which you have provided to us to a third party of your choice. Once we have actioned this request and the data has been transferred, the other party will be responsible for looking after your personal data.

You are entitled to receive a copy of the information we hold about you. If you would like a copy of your information, please contact our Data Protection Officer, quoting your name, address and insurance policy number or quotation reference.

We will use reasonable efforts in accordance with our legal duty to supply you with the information requested.

As part of the request for your information, we will require you to provide us with a form of identification which displays your name and address. We request this proof of identity to ensure that we do not send personal data or information to the wrong person. Acceptable forms of identification can be;

- Passport
- Driving Licence
- Birth Certificate
- Utility Bill (from the last 3 months)
- Current vehicle registration document

### **How long will CETA Insurance keep my information?**

We will hold your personal data on our systems for as long as is necessary for the relevant activity. In the event that you purchase an insurance policy, we keep records for a minimum period of seven years from the expiry of your policy or as otherwise required by law. This is for our own reporting, regulatory requirements and to protect ourselves in the event of any legal claims and complaints.

### **What if I am a user under the age of 18?**

We do not provide insurance quotations or set up a CETA account for anybody under the age of 18. We make this clear on our enquiry forms.

### **Your CETA account / Customer Zone**

On purchasing an insurance policy through ourselves we will set you up with an account for our Customer Zone. This is our secure area which will allow you to have instant access to your insurance policy documents and insurance policy information at any time on any computer, tablet or smartphone. In order to access this document, you will require the email address which you provided while making the application for insurance along with the password which you create on completion of the purchase.

### **Security and International Transfers**

We are committed to ensuring that your personal data is secure. In order to prevent any unauthorised access or disclosure to any data which we hold, we have in place suitable physical, electronic and managerial procedures to safeguard the information which we collect online.

All data processed by CETA Insurance Ltd is stored either within the UK or within the EEA. However, there may be instances where information you provide may be passed to countries outside the European Economic Area ("EEA") for processing. For example; this may happen if any of our servers are from time to time located in a country outside the EEA, an outsourced call centre is used or one of our insurers or providers are located in a country outside the EEA. These countries may not have similar data protection laws to the EEA. If we transfer your information outside the EEA in this way, we will take steps to ensure that your personal data continues to be protected to ensure compliance with data protection laws. Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

Where we have provided you with, or where you have chosen a password which enables you to access your documents within certain areas of our websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

### **Automated Decision Making**

We use a quote engine in order to provide you with a quotation. This takes account of the risk information you provide to us during the quote process.

During the quote process, our quote engine asks questions to narrow down the selection of products that we will provide details on. We will only return quotations for you based on the answers which you provide to us.

## **What to do if you have a complaint**

It is our intention to provide you with a high level of customer service at all times. However, if you wish to register a complaint, please contact us:

...in writing The Complaints Manager, CETA Insurance Limited, CETA House, Cromwell Business Park, Chipping Norton, Oxfordshire, OX7 5SR

...by email [insurance@ceta.co.uk](mailto:insurance@ceta.co.uk)

... by phone Telephone 01608 647601

In the event which you are dissatisfied with the outcome following your complaint regarding your data, you may be able to complain to the Information Commissioner's Office. Further details of your rights under GDPR can be found by visiting the ICO website at; <https://ico.org.uk>.

## **Your responsibility for the information you provide / Additional information**

You will need to answer a number of questions in order to obtain a quote for an insurance product. These cover the set of questions needed by all the insurance service providers whose details appear on this site. The level of cover and the amount you pay will be determined by the answers you provide to these questions and therefore you should answer all questions to the best of your knowledge and belief. If you fail to provide the insurer with all the necessary information requested, it may lead to you having no insurance or having to pay an additional premium.

All cover features shown are indicative, and actual availability may be subject to additional eligibility criteria requested by insurers. Please check the individual insurance policy terms and conditions to confirm the cover that will apply in your individual circumstances.

## **Changes to this privacy notice**

This Privacy Notice is subject to change from time to time, so we encourage you to refer back to it.

Should we make any significant changes we will endeavour notify customers.